

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FREE SPEECH COALITION, INC., et al.)	Civil Action No. 2:09-4607
)	
Plaintiffs,)	
)	JUDGE MICHAEL M. BAYLSON
-vs-)	
)	
THE HONORABLE ERIC H. HOLDER, JR.,)	PLAINTIFFS' NOTICE PURSUANT TO
Attorney General,)	RULE 44.1, FEDERAL RULES OF
)	CIVIL PROCEDURE, OF RELIANCE
Defendant.)	ON FOREIGN LAW
)	

Plaintiffs, pursuant to Rule 44.1, Federal Rules of Civil Procedure, give notice of their intent to rely on Section 204.a of the Penal Code of Norway, attached.

Respectfully submitted,

/s/ J. Michael Murray
J. MICHAEL MURRAY (0019626)
jmmurray@bgmdlaw.com
LORRAINER BAUMGARDNER (0019642)
lbaumgardner@bgmdlaw.com
BERKMAN, GORDON, MURRAY & DeVAN
55 Public Square, Suite 2200
Cleveland, Ohio 44113-1949
(216) 781-5245 / (216) 781-8207 (Facsimile)

KEVIN E. RAPHAEL (72673)
KER@Pietragallo.com
J. PETER SHINDEL, JR. (201554)
JPS@Pietragallo.com
PIETRAGALLO GORDON ALFANO BOSICK
& RASPANTI, LLP
1818 Market Street, Suite 3402
Philadelphia, Pennsylvania 19103
(215) 320-6200 / (215) 981-0082 (Facsimile)

Attorneys for Plaintiffs

PENAL CODE OF NORWAY

Section 204 a. Any person who

- a) produces, procures, imports, possesses, delivers to another person or for payment or systematically acquaints himself with any presentation of sexual abuse of children or any presentation of a sexual nature that involves children,
- b) concerns himself with presentations of sexual abuse of children or presentations of a sexual nature that involve children in any other way as referred to in section 204, first paragraph, or
- c) induces any person under 18 years of age to allow pictures of himself or herself to be taken as part of any commercial presentation of moving or non-moving pictures of a sexual nature, or produces such presentations depicting any person under 18 years of age,

shall be liable to fines or imprisonment for a term not exceeding three years.
In this section child means any person who is or who appears to be under 18 years of age.

Any person who negligently commits any act referred to in the first paragraph shall be liable to fines or imprisonment for a term not exceeding six months. The same penalty shall apply to any proprietor or superior who wilfully or negligently fails to prevent the commission in any activity of any act referred to in the first paragraph.

The penalty may be remitted in the case of any person who takes and possesses a picture of a person who is between the ages of 16 and 18 years if the latter has consented thereto and both of them are about equal in age and development. Section 204, second paragraph, second sentence, and fourth paragraph, shall apply correspondingly.

<http://www.lovdato.no/all/tl-19020522-010-023>.

http://www.un.org/depts/los/LEGISLATIONANDTREATIES/PDFFILES/NOR_penal_code.pdf

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2013, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ J. Michael Murray

J. MICHAEL MURRAY (0019626)

LORRAINE R. BAUMGARDNER (0019642)

BERKMAN, GORDON, MURRAY & DeVAN

KEVIN E. RAPHAEL (72673)

J. PETER SHINDEL, JR. (201554)

PIETRAGALLO GORDON ALFANO BOSICK

& RASPANTI, LLP

Attorneys for Plaintiffs